UNITED STATES DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
WASHINGTON, DC

FSIS DIRECTIVE

8010.2 | 6/5/07

INVESTIGATIVE METHODOLOGY

NOTE: DO NOT IMPLEMENT THIS DIRECTIVE UNTIL SEPTEMBER 5, 2007.

CHAPTER I – GENERAL

I. PURPOSE

A. This directive provides the methodologies that Investigators, Supervisory Investigators (SI), and Regional Managers (RM) of the Food Safety and Inspection Service (FSIS), Office of Program Evaluation, Enforcement and Review (OPEER) will apply when conducting investigations of allegations, apparent violations, or incidents relating to the Federal Meat Inspection Act (FMIA), Poultry Products Inspection Act (PPIA), Egg Products Inspection Act (EPIA), the Humane Methods of Slaughter Act (HMSA) (the Acts), and other laws and regulations.

B. Chapter I. sets out the responsibilities of OPEER personnel. Chapter II. establishes an investigative methodology. Chapter III. explains how to conduct an analysis after the investigation and how to make investigative decisions. Chapter IV. provides the procedures for preparing a Memorandum of Interview, a statement, and receiver's certification.

II. CANCELLATION

FSIS Directive 8040.1, Reports of Apparent Violations, dated 6/22/94

III. RESERVED

IV. REFERENCES

Federal Meat Inspection Act (FMIA) (21 U.S.C. 601 et seq.)
Poultry Products Inspection Act (PPIA) (21 U.S.C. 451 et seq.)
Egg Products Inspection Act (EPIA) (21 U.S.C. 1031 et seq.)
Humane Methods of Slaughter Act (HMSA) (7 U.S.C. 1901-1907)
Agricultural Marketing Act of 1946, as amended (7 U.S.C. 1621, et seq.)
21 U.S.C. 458 (a) (3)
9 CFR Sections 320.4, 381.146, 381.178 and 590.200
FSIS Directive 8010.1, Methodology for Conducting In-Commerce Surveillance Activities
FSIS Directive 8010.3, Procedures for Evidence Collection, Safeguarding and Disposal
FSIS Directive 8410.1, Detention and Seizure

FSIS Directive 8010.4, Report of Investigation
FSIS Directive 8010.5, Case Referral and Disposition
FSIS Directive 8100.1, Planned Compliance Program

V. BACKGROUND

Under the Federal Meat Inspection Act, Poultry Products Inspection Act, Egg Products Inspection Act, the Humane Methods of Slaughter Act (the Acts), and other related laws, FSIS has the legal authority to regulate meat, poultry, and egg products in U.S. commerce. These Acts state that it is essential to the public interest to protect the health and welfare of consumers by ensuring that meat, poultry, and egg products distributed to them are wholesome and not adulterated and are properly marked, labeled, and packaged.

FSIS conducts surveillance and investigative activities at food warehouses, distribution centers, retail stores, and other in-commerce businesses where meat, poultry, and egg products are stored, offered for sale or sold, and distributed. These activities are designed to ensure that meat, poultry, and egg products are safe, secure, wholesome, and not adulterated and are properly marked, labeled, and packaged. When violations of the Acts are alleged or detected, FSIS Investigators control or detain adulterated or misbranded products in-commerce, investigate allegations or violations, and document a Report of Investigation (ROI) as set out in FSIS Directive 8010.4, "Report of Investigation", to support Agency decisions, investigative findings, and enforcement or legal actions.

VI. RESPONSIBILITIES

A. INVESTIGATOR

An Investigator is to:

1. Conduct investigative activities and investigations in accordance with this directive.

2. Maintain original evidence (e.g., original signed statements) for each investigation in a secure area.

3. Maintain Investigator's notes, copies of evidence, and any non-evidentiary documentation in a work file for each investigation.

4. Develop an Investigative Plan in accordance with this directive.

5. When findings or evidence dictate a change to the Investigative Plan, revise the plan accordingly.

6. Maintain communication with the SI regarding investigative activities from the initiation of an investigation through the investigative decision.

B. SUPERVISORY INVESTIGATOR

A SI is to:

1. Monitor and coordinate the investigative caseload of Investigators under his or her supervision.

2. Maintain communication and be available to discuss investigative activities with the Investigator from the initiation of an investigation through the investigative decision

3. Periodically update the Regional Manager (RM) with the status of complex or unusual investigations.

C. REGIONAL MANAGER

A RM is to:

1. Monitor the regional investigative caseload.

2. Review cases to verify that the facts and evidence support the investigative findings.

3. Recommend disposition action based on the criteria set out in FSIS Directive 8010.5, “Case Referral and Disposition.”

VII. INVESTIGATORS’ NOTES

A. Investigators’ notes are a contemporaneous record regarding surveillance, investigative, or other activities. These notes are to be accurate, objective, factual, and free of personal feelings or conclusions. Notes are confidential because of the data they may contain (i.e., information pertaining to open investigations, confidential business information, and personal information protected under the Freedom of Information Act (FOIA) and Privacy Act.)

B. When Investigators make notes, they are to:

1. be handwritten or electronic;

2. be made in a manner and in a recording medium that will provide continuity and integrity (e.g., bound or loose-leaf notebook or loose paper) and maintain the notes

in accordance with the retention schedule of the corresponding case;

3. identify notes with the author’s name, title, telephone number, and address; and,

4. save electronic notes and store them in a manner that ensures data integrity (e.g., on a CD-R or computer disk).

CHAPTER II – INVESTIGATIVE METHODOLOGY

An investigation is a fact-gathering and analytical activity conducted to develop and document facts relevant to allegations or observations of apparent violations or food safety incidents to support Agency decisions, investigative findings, and enforcement or legal actions.

This directive provides the steps and methods necessary to conduct the investigative process effectively. Although the directive presents the steps sequentially, some aspects of the investigation may occur simultaneously.

I. INITIATION OF AN INVESTIGATION

A. Investigations are initiated in response to several different types of occurrences. The four main occurrences that lead to the initiation of an FSIS investigation are:

1. An observation by an Investigator of an apparent violation while conducting surveillance activities;

2. A referral of an allegation is received from other internal FSIS program areas (e.g., Office of Field Operations or Office of International Affairs) regarding possible violations involving regulated product;

3. A referral of an allegation is received from an outside agency (e.g., Federal agency or a State or local government agency) regarding possible violations involving regulated product; and

4. A referral of an allegation is received from a private citizen, organization, or association (e.g., industry, consumer, or informant) that advises FSIS of information or facts regarding possible violations involving regulated product.

B. Investigators are to use the appropriate code on FSIS Form 8000-8 (Review and Compliance Record) to report the basis on which the case was initiated for entry into the Planned Compliance Program (PCP) in accordance with FSIS Directive 8100.1, “Planned Compliance Program.”

II. ASSESSMENT OF AN ALLEGATION OR VIOLATION

A. When an OPEER RM, SI, or Investigator receives an allegation or observes an apparent violation, he or she:

1. is to assess the allegation and available facts relevant to the alleged violation and determine whether the allegations and available facts establish a basis for concern that a violation of FSIS statutes or regulations has occurred;

2. is to verify that FSIS has jurisdiction and authority to investigate the alleged violation; and

3. may conduct a preliminary inquiry to assess the validity of the allegation or information, or the reliability of the source.

B. When the available facts and results of the preliminary inquiry do not substantiate that a violation of FSIS statutes or regulations has occurred, or if FSIS does not have jurisdiction and authority, Investigators are to:

1. discuss these findings with the SI; and

2. recommend that no action be taken; or, refer the apparent violation of or the allegation to the appropriate Federal, State, or local government agency.

C. When FSIS has jurisdiction and authority, and the available facts or preliminary inquiry indicate that a violation of FSIS statutes or regulations has occurred, the RM or designee is to determine, in accordance with the criteria set forth in the Memorandum of Understanding (MOU), whether to refer the allegation to the Office of Inspector General (OIG) for investigation.

1. if the allegation is referred to the OIG, the OIG will determine whether to investigate (e.g., open a case memorandum); or

2. if the OIG declines to open an investigation, or if the RM or designee determines that referral to the OIG is not required under the MOU, FSIS may initiate a formal investigation.

III. INVESTIGATIVE PLAN

A. Planning helps to ensure that an investigation is thorough and well-organized and promotes efficient use of resources. Investigators are to prepare a written plan for conducting investigations (Investigative Plan).

B. There may be situations when it is not necessary to prepare an Investigative Plan. For example:

1. A situation in which an Investigator recognizes and identifies an apparent violation of the Acts while conducting surveillance activities and concurrently collects all available evidence relevant to the violation. The Investigator and his or her supervisor may determine that the evidence is sufficient to prove the violation.

2. A situation in which the investigative findings and supporting evidence in the ROI prove a minor violation of the Acts, and the violation is closed with a Notice of

Warning pursuant to the Acts.

C. Investigative Plans consist of the following elements:

1. File Number - A unique identifier that is assigned to the case for use from initiation to final disposition.

2. Subject of the Investigation - Include the name, title, or business affiliation if relevant to the case.

3. Allegations/Violations - A brief summary of the allegations or facts upon which the investigation is based. Include statute citations (e.g., 21 U.S.C. 458 (a) (3), improperly stored poultry products which were capable of use as human food held under insanitary conditions, which storage had the effect of causing such products to become adulterated, and while such poultry products were being held for sale after transportation in commerce) and any pertinent regulations.

4. Scope of Investigation - The proposed scope of the investigation based on available information (e.g., identify the magnitude of the allegation or violation and any related public health concerns). If the scope of the investigation cannot be determined with the available information, the Investigative Plan is to indicate at what point a determination of the scope will be made through discussion with the SI or RM.

5. Investigative Steps - Identify and prioritize the steps necessary to develop the information and to collect evidence on the allegations or apparent violation. The steps may include one or all of the following:

a. Investigative Techniques - Investigators are to use appropriate investigative techniques to ensure that material facts are developed, and that relevant evidence is collected (e.g., interviewing and record/document collection and analysis).

b. Resources - Identify the resources necessary to meet investigative needs (e.g., personnel, equipment, and timeframes).

c. Safety - Identify resources and tools that are to be used should the investigation involve situations that could become hostile, unsafe, or potentially dangerous.

d. Investigative Liaison - Coordinate with the appropriate Agency or other Government officials if issues or situations are observed or encountered that involve Investigator safety (e.g., OIG, State, or local police), public health concerns or issues (e.g., FSIS' Office of Public Health Science, the Centers for Disease Control and Prevention, and State or local agencies), or food security issues (e.g., OIG, FSIS' Office of Food Defense and Emergency Response, or the Federal Bureau of Investigation).

D. Investigators need to evaluate the Investigative Plan continually as the investigation progresses; and to revise the Plan as findings are developed or evidence is collected that dictate a revision.

IV. THE INVESTIGATION

A. Investigative activities include, but are not limited to, those activities performed to investigate an allegation or an apparent violation observed during surveillance activities.

B. When conducting an investigation, Investigators are to use appropriate investigative techniques to ensure that material facts are developed and that relevant evidence is collected and preserved to support alleged or apparent violations. These techniques include:

1. Examining meat, poultry, or egg products and the facilities and conditions under which they are held using the methodology as set forth in FSIS Directive 8010.1, "Methodology for Conducting In-Commerce Surveillance Activities," to determine whether they are wholesome, not adulterated, and properly marked, labeled, and packaged, or exempt from the requirements of the Acts.

2. Collecting and submitting investigative samples of meat, poultry, or egg products alleged to be in violation of the Acts in accordance with FSIS Directive 8010.3, Procedures for Evidence Collection, Safeguarding and Disposal. Laboratory analysis findings may prove the allegation or violation or be used to focus the investigation.

3. Photographing meat, poultry, or egg products alleged to be in violation of the Acts and any conditions that may have contributed to the violation in accordance with FSIS Directive 8010.3.

4. Detaining meat, poultry, or egg products, in accordance with FSIS Directive 8410.1, "Detention and Seizure," that there is reason to believe are adulterated, misbranded, or otherwise in violation of the Acts. Investigators may work jointly with other Federal, State, or local agencies to use other means to control product (e.g., State Health Department embargos).

5. Identifying persons, firms, individuals, responsible management officials, product owners or custodians, or possible witnesses.

6. Examining, copying, and collecting records (e.g., invoices, contracts, temperature records, and HACCP records) relevant to the alleged violation or other allegation. Investigators are to examine and collect records or documents and to analyze these evidentiary documents carefully to assess whether the content will prove the violation or allegation under investigation. Findings may be subject to differing

interpretations; therefore, Investigators are to examine the evidence for inconsistencies and either resolve the issues or be prepared to explain the contradictions (make notes of explanations to refresh memory in case of time lapse). Investigators are to collect documentary evidence in accordance with FSIS Directive 8010.3.

7. Discussing the allegation or apparent violation with persons, individuals, responsible management officials or their designees, product owners or custodians, or witnesses in a conversation or interview and document the conversation or interview in a memorandum of interview (MOI), a statement, or a Shipper's or Receiver's Certification (FSIS Form 8050-2) in accordance with Chapter IV of this directive.

8. Conducting additional interviews to obtain information about the subject matter of an inquiry or investigation. Two key components of the interview process are preparation for the interview and the ability to record the interviewee's responses accurately, including any exculpatory statements that might clear the interviewee or other subjects of alleged fault or guilt. Information obtained during interviews may:

a. explain, confirm, supplement, and expand upon the facts;

b. pinpoint what witnesses heard or observed;

c. help correlate, identify, and explain evidence; and

d. permit persons involved to admit, deny, or explain actions.

NOTE: Investigators are to document all interviews to preserve information in either an MOI or a statement in accordance with Chapter III of this directive.

9. Determining whether product may have been shipped to other entities ("trace-forward" activities), or whether product came from other entities, where it still may be present ("trace-back" activities). Investigators conduct trace-forward and trace-back activities to determine the scope of the incident and to determine the extent of detention actions necessary to control adulterated or misbranded product. These activities may occur simultaneously at multiple locations in multiple areas. Investigators should coordinate related activities to ensure that they are done in a manner that will preserve the integrity of the investigation. Investigators are to collect associated records and any other relevant evidence and conduct interviews with employees at multiple levels of the organization (e.g., president, manager, or employee) to determine the following information:

a. Product Identifying Information - Include pertinent information on container type, size, lot codes, production or pull dates (if available), and product origin.

b. Shipping and Receiving Practices –

i. Determine the receiving dates and times for each shipment of the identified products in the requested time period.

ii. Indicate how the dates on the shipping records reflect the receipt date of the product.

iii. Determine how the supplier documents or records deliveries.

iv. Determine the firm's suppliers or consignees during this time period.

c. Handling and Storage Practices - Interview employees regarding handling and storage of the implicated product.

d. Stock Rotation Practices - Review the standard operating procedures or good manufacturing practices at the firm for stock rotation (e.g., first-in-first-out) and determine how closely the firm follows the procedures or practices.

e. Sanitation and Pest Control Records - Determine whether the firm has, or has had, issues or concerns directly related to, or having impact on, the implicated product.

10. Performing searches of relevant public records, including Google searches of public records.

C. Investigators are to collect and safeguard evidence in accordance with FSIS Directive 8010.3, to ensure positive identification of evidence and that chain of custody is documented, so that the integrity of the evidence is maintained, and the evidence is admissible in any litigation. They are also to evaluate the facts and evidence periodically to determine which investigative findings they support, because the scope of the investigation may expand beyond the original apparent violation or allegation to include additional areas of inquiry.

D. Investigators may conduct covert surveillance of people, places, or things to obtain information. Investigators may conduct this activity on foot, in vehicles, or from a fixed location and by using photographic equipment to document the subject activity.

E. An Administrative *Subpoena Duces Tecum* is used to obtain access to facilities or collect copies of records, when necessary. Investigators are to contact, through supervisory channels, the Evaluation and Enforcement Division (EED), OPEER, and provide any supporting information necessary to obtain the subpoena. EED and the Regional Office are to coordinate the delivery of the subpoena with support from Federal, State, or local authorities, as necessary, to ensure Investigators' safety.

CHAPTER III – ANALYSIS AND INVESTIGATIVE DECISION

I. ANALYSIS

After the evidence is collected, the Investigator is to organize the evidence in a logical and coherent fashion and analyze the evidence to determine findings. The Investigator should consider the evidence thoroughly and impartially, and make findings of fact, as supported by the evidence.

II. INVESTIGATIVE DECISION

A. If the Investigator does not believe that the findings and evidence support further action, he or she is to recommend closing the investigation.

B. If the Investigator believes that further investigation is needed that would require the use of special investigative techniques as set out in the MOU with OIG, he or she is to recommend that the findings be referred to OIG for further joint investigative activities.

C. If the Investigator believes that the findings and evidence support further action, he or she is to complete an ROI as set out in FSIS Directive 8010.4, “Report of Investigation.” The Investigator is to refer the ROI to the RM through the SI for enforcement action as set out in FSIS Directive 8010.5, “Case Referral and Disposition” (e.g., issuance of a Notice of Warning, State referral, referral for civil or criminal prosecutive consideration, or other action).

CHAPTER IV – PROCEDURES FOR MEMORANDUM OF INTERVIEW, A STATEMENT, AND SHIPPER'S AND RECEIVER'S CERTIFICATION

I. MEMORANDUM OF INTERVIEW (MOI)

A. An MOI is the Investigator's written summary of the relevant information elicited from an interviewee. An Investigator prepares an MOI to record the specifics of an interview. The format to be followed in preparing an MOI is as follows:

1. Show the date and the location of the interview in the upper right-hand corner of the first page.

2. Enter the title "Memorandum of Interview" on the first page, centered and in bold font.

3. Enter the name and title of interviewer; name, address, employer, official job title, and length of service for the interviewee; and names and titles of others present during the interview in a heading format prior to the first paragraph.

4. The first paragraph should indicate how the Investigator identified himself or herself. This description of the introduction/identification process should be detailed and thorough and should include documentation of the interviewee's acknowledgement.

Example:

Investigator Frebish and I introduced ourselves to Ms. Jones and presented our credentials to her. I explained that we were Investigators with the Office of Program Evaluation, Enforcement and Review, Food Safety and Inspection Service, United States Department of Agriculture. Ms. Jones acknowledged that she understood our official capacity.

5. Use either the first or the second paragraph to state the purpose of the interview to provide a pre-summary that informs the reader early in the MOI what kind of information this MOI will reveal.

6. The remainder of the body of the MOI should contain the facts elicited from the interviewee and should be presented in a logical and concise manner. Present the facts in a narrative fashion using paragraphs to separate different segments and write in the 1st person to depict first-hand knowledge of the interview.

7. Include a closing statement to account for the date the MOI was prepared and to certify that it contains all the information discussed during the interview.

Examples:

I prepared this report on ____, 20_ , immediately after the interview with the witness. I certify that this report has recorded in it a summary of all pertinent matters discussed with the interviewee.

OR

I prepared this report on ____, 20_ , two weeks after the interview with the witness for inclusion in the Report of Investigation with the witness's signed statement. I certify that this report has recorded in it a summary of all pertinent matters discussed with the interviewee on ____ , 20_.

B. The Investigator documenting the MOI is to promptly sign and date the document.

C. If a partner Investigator participated in the interview, he/she may sign the MOI as a witness.

D. When more than one page is necessary for an MOI, number each page for order clarification (e.g., Page 1 of 2, Page 2 of 2).

II. STATEMENTS

A. A statement is a written description of the facts, events, or other relevant information provided by an interviewee of his or her knowledge of, or role in, the subject of the investigation or inquiry. Investigators are to provide all interviewees with a copy of the Privacy Act Notice and an explanation of the Notice. The Privacy Act Notice can be found in Outlook at:

Outlook/Public Folders/All Public Folders/FSIS Issuances/Forms/8000 Series

B. Investigators are to prepare statements in the following format:

1. Show the date and the location of the interview in the upper right-hand corner of the first page.

2. The opening paragraph should include the name of the subject being interviewed and name and title of the Investigator conducting the interview, attest that the information is being provided freely and voluntarily, reflect an understanding of what the interview is in regard to, and provide Privacy Act notification.

Example:

I, Edward A. Jones, make the following statement in regard to inquiries made by Clyde Frebish, who has identified himself to me as an Investigator, Office of Program Evaluation, Enforcement and Review, Food Safety and Inspection Service, United States Department of Agriculture. I am providing this information freely and voluntarily. I understand that a possible violation of the Federal Meat or Poultry Inspection laws may be involved. I have been furnished a copy of the Privacy Act Notice.

3. When more than one Investigator participates in an interview, include his or her name in the opening paragraph of the statement.

4. The second paragraph should state the interviewee's date of birth, address, official job title, name of employer, and length of service.

Example:

I was born November 29, 1941, in Boise, Idaho. I live at R.D. #1, Turlock, California. I own and operate the Edward Jones Cattle Company, 100 Main Street, Turlock, California. I have been buying and selling cattle for the past 10 years.

5. The body of the statement should be written in the 1st person and employ language that the subject used previously or can understand. Avoid composing a statement that does not reflect the subject's exact language or that contradicts previous statements. The statement should describe important general facts, including the facts of the violation and any events leading up to the violation, the subject's intent and motivation, how the subject is involved in the violation, and specific facts of the violation, such as the amount of FSIS-regulated product involved or affected. The statement may summarize some details succinctly as long as the summarization of this information does not affect the content of the statement.

6. The concluding paragraph of the statement should contain an attestation that declares: the number of pages in the statement, that the interviewee has read, or has had read to him/her, the statement; that he/she initialed each page and each correction; and that the statement is complete and true to the best of his or her knowledge.

7. Type or print each signatory name under the concluding paragraph, leaving enough space for signatures.

8. Have the interviewee initial any additions, erasures, or strikeouts; sign or initial each page; and sign the statement above his or her name.

9. The Investigator preparing the statement should sign the last page of the statement above his or her name.

10. Allow the interviewee the opportunity to make corrections or additions to the statement. Observe the interviewee while he or she initials all corrections and signs the statement.

11. In a situation where the interviewee refuses to sign a statement, but admits that the content is true, add an addendum to the statement that declares that the statement was read by or to the interviewee, who acknowledged the content to be true, but refused to sign the statement. Ensure that Investigators and any other persons who heard the acknowledgement sign the addendum attesting that he/she witnessed the acknowledgement.

12. Special Circumstances - When a signed statement is obtained from an individual who cannot read, write, or speak a language understood by the Investigator, a third-party witness is required (e.g., relative, friend, neighbor, or employee) who is able to understand the Investigator. Prepare the statement as follows:

a. Individual cannot read - allow the witness to read the statement to the individual so the witness can attest that what was written was in fact read. The last paragraph is modified as follows - “I have had read to me the preceding statement consisting of (number of handwritten/typed) pages and have been given an opportunity to make additions or corrections. It is true and correct to the best of my knowledge.”

b. Individual cannot write (sign name) - have the individual make his or her identifying mark so that the witness can attest that the individual signed the statement.

c. Individual cannot speak the language - use a third-party witness who can interpret the conversation. Modify the last paragraph as follows: “(Name of interpreter), acting as my interpreter, has read to me the preceding statement consisting of (number of handwritten/typed) pages. I have been given an opportunity to make additions or corrections, and it is true and correct to the best of my knowledge.”

d. Third-party witness - show on the statement the name, address, and relationship of the witness to the individual. The witness signs the statement.

e. When the interviewee’s attorney is present, provide him/her the opportunity to sign as a witness and include the name and address of the law firm and the capacity in which he or she is serving the interviewee.

III. SHIPPER'S OR RECEIVER'S CERTIFICATION (FSIS FORM 8050-2)

A. The Shipper's or Receiver's Certification is used to document initial contact with the shipper or receiver of meat, poultry, or egg products that appear to be in violation of the FMIA, PPIA or EPIA. However, care should be exercised in the use of this form as a means to document the knowledge of, or role with regard to, an individual shipper or receiver if that individual appears to have violated the law. Investigators can find FSIS Form 8050-2 at:

Outlook/Public Folders/All Public Folders/FSIS Issuances/Forms/8000 Series

B. Complete each block of the Shipper's or Receiver's Certification.

1. Description of Product - Mark the appropriate block to identify the statement as that made by the shipper or receiver. Describe the product by its common or usual name. Show approximate weight and number of items or containers shipped or received.

2. Date Product was Shipped or Received - Enter the phrase "on or about" and the date or dates "shipped" or "received."

3. Observed By - Enter the names of FSIS personnel involved.

4. Place Where Observed - Enter location where product was observed.

5. Date Observed - Enter date product was observed.

6. Name and Address of Shipper - Enter the shipper's organizational name and address as identified by the consignee, invoice, receiving ticket, or other available material.

7. Type of Shipping Records - Enter type of shipping records examined, if any were available.

8. Shipping Record Numbers - Enter the identifying number from the bill of lading or other available shipping record.

9. Date of Shipping Records - Enter date of shipping record, if any.

10. Name of Processor and Address - Enter the processor's organizational name and address. If the shipper and processor are the same, the entry "Same as item 6" will suffice. If the case involves several processors, enter the name and address of the main processor, plus the word "various."

11. Method of Transportation - Enter the mode of transportation, such as

Shipper's truck, Consignee's truck, or Tom Jones Company. Do not use the word "truck" without clarification of its owner or operator.

12. Markings on Containers or Product – Enter identifying marks observed on containers or product.

13. Invoice Issued By - Enter the name and address of the person or firm that issued the invoice, or if the name is the same as item 6, the entry "Same as item 6."

14. Invoice Number - Enter the invoice number, or, if the invoice is not numbered, enter other identifying features of the invoice.

15. Date of Invoice - Enter the invoice date.

16. Remarks - Entries in this block are to be brief and clarify the findings.

17. Certification - Enter the organizational name and address of the shipper or receiver, or his or her representative. Enter the date of signature. In the area directly under his or her signature, print or type the true name (not nickname) of the person who signed the statement. Do this in the presence of the signatory.

Refer questions to the Technical Service Center at 1-800-233-3935.

Assistant Administrator
Office of Policy, Program, and Employee Development